



March 28, 2003

Ms. Verneta Simon, On-Scene Coordinator  
Mr. Fred Micke, On-Scene Coordinator  
U. S. Environmental Protection Agency  
Region 5  
77 W. Jackson Blvd., SE-5J  
Chicago, Illinois 60604

**EPA Region 5 Records Ctr.**



**227075**

RE: Response to USEPA Review Comments Letter dated March 19, 2003 Regarding 341 East Ohio Street Completion Report – STS Project No. 1-25585-XJ

Dear Ms. Simon and Mr. Micke:

STS Consultants, Ltd. (STS) on behalf of TRS, has prepared this letter in response to your review comments to the above-referenced Completion Report. We have summarized our responses to your comments below, and have attached revised pages and attachments, as needed for incorporation in the Completion Report.

**Comment**

Page 11, first para., first line – The site “another location” should be identified specifically.

**Response**

We have replaced the phrase “another location” with “the field laboratory established for the Lindsay Light II North Columbus Drive/OU3 site”.

**Comment**

Page 11, Section 2.8.2 Phase I, line 2 – The verification areas were actually subdivided by Stan A. Huber Consultants, Inc.

**Response**

This sentence has been revised to indicate the areas were subdivided by STS.

**Comment**

Page 19, Section 3.1, sentence 2 – The process by which container weights were estimated is not described.

**Response**

The text has been revised to indicate the estimated weights are based on weighed containers from previous shipments.

**Comment**

Page Section 4.1, sentence 3 – This sentence states that rebar was “cut off.” Section 2.9.6, para. 1, sentence 3, states that the tarps could not be drawn because rebar interfered with the tarps. These sections need to be consistent.

**Response**

Reference to cutting off protruding reinforcing steel in Section 4.1 describes the proper management of the concrete rubble removed from the site. Reference to the untarped trucks and the reason for failure to cover the trucks describes work not in compliance with the Work Plan. When the work was done properly and in compliance with the Work Plan, the steel was cut off and the trucks were tarped. It is our opinion that both statements are accurate and no inconsistency exists; one reference was to the proper way to operate, and one reference described work that was out of compliance.

**Comment**

Page 21, Section 4.2 – This document does not state that any pesticide contaminated soils were found in radiologically contaminated areas. Figure 6A, shows that, at least for those radiologically contaminated areas east of grid line 13, that there was a potential for both contaminants to be present. If there was not any soil containing both radiological and pesticide soil over criteria, it should be stated directly.

**Response**

Please note reference in paragraph 2 of Section 2.5 on page 8 to locations where pesticide-impacted soils also included radiological-impacted material.

**Comment**

Page 22, Section 5.1.3 – If offsite materials were brought in it should be stated they were analyzed and met the offsite concentration criterion. If there were not any offsite materials brought in, it should be stated that analyses were [not] needed.

**Response**

The only material imported to the site was the limestone gravel brought to cover the site as part of the site restoration. No testing of this gravel was performed.

**Comment**

Page 24, Section 5.3.1, para. 2 – The perimeter air monitoring criterion was the air concentration found in Title 10, Part 20, Appendix B, Table 2, Column 1 of the Code of Federal Regulations. This did not involve a Derived Air Concentration (DAC).

**Response**

The text has been revised to add reference to Title 10, Part 20, Appendix B, Table 2, Column 1 of the Code of Federal Regulations, and to indicate the DACs are not the perimeter air monitoring criteria.

**Comment**

Page 24, Section 5.3.2 – The limits for the personal air monitors are the occupational limits of Title 10, Part 20, Appendix B, Table 1, Column 3 of the Code of Federal Regulations. These are in the DACs.

**Response**

The text has been revised to add reference to Title 10, Part 20, Appendix B, Table 2, Column 3 of the Code of Federal Regulations.

**Comment**

Page 25, Section 5.5 – The source of criteria for release surveys should be stated.

**Response**

The text has been revised to refer to SOP-345, Surveys for Surface Contaminants and Release of Equipment for Unrestricted Use, which contains the references to 32 IAC parts 310 and 340 Standards for Protection against Radiation, and NUREG CR5849 Manual for Conducting Radiological Surveys in Support of License Termination.

**Comment**

Appendix N – this appendix is empty. Shipping manifests should be provided.

**Response**

The CD with the manifests was inadvertently omitted from the appendix sleeve. A copy is included.

**Comment**

*Additional comment – there is no appendix providing the soil Chain of Custody forms.*

**Response**

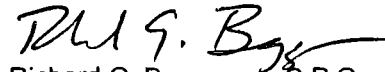
A new Appendix P has been added to include the chain of custody forms.

Based on our discussions with you regarding these revisions, we understand the report will be final as of receipt of these revisions. We are therefore including signed affidavits which complete our preparation of these reports.

We appreciate your assistance in this very interesting project.

Regards,

STS CONSULTANTS, LTD.



Richard G. Berggreen, C.P.G.  
Principal Geologist

cc: John Watson, Gardner Carton and Douglas  
Thomas Pabian, Capri Capital  
Terry McKay, Capri Capital  
Mark Krippel, Kerr-McGee

Attachments